

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Maria Suarez,

Plaintiff,

-against-

Case No. 2:19-cv-07271-JS-SIL

Southern Glazer's Wine and Spirits of New York,
LLC,

Defendant.

PROPOSED DISCOVERY PLAN

Plaintiff Maria Suarez and Defendant Southern Glazer's Wine and Spirits of New York, LLC submit the following Proposed Discovery Plan in connection with the Initial Conference scheduled for January 20, 2021, at 12:00 P.M. (Eastern), and pursuant to the Court's Initial Conference Order (Doc. No. 11):

Deadlines & Court Appearances	Date
Exchange of Rule 26(a)(1) disclosures	January 18, 2021
Service of first interrogatories and document demands	February 3, 2021
Responses to first interrogatories and document demand	March 22, 2021
Motion to join new parties or amend the pleadings	April 5, 2021
Status conference in courtroom 820	TBD by Court
Completion of depositions	May 6, 2021
Identification of case-in-chief experts and service of Rule 26 disclosures	July 5, 2021
Identification of rebuttal experts and service of Rule 26 disclosures	August 4, 2021
Commencement of summary judgment motion practice	October 4, 2021
Pretrial conference in courtroom 820	TBD by Court


Dated: January 12, 2021

JOINTLY AND RESPECTFULLY SUBMITTED:



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ATTORNEYS FOR DEFENDANT

SO ORDERED THIS ___ DAY OF _____ 2021:

The Honorable Steven I. Locke
United States Magistrate Judge